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NOTE: CHANGES HAVE BEEN
MADE TO THIS DOCUMENT

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Attorneys for Defendants, ORANGE COUNTY DEPUTY SHERIFF PAUL
McHUGH

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

JAY EDSON SLADE, JR.,

Plaintiff,

vs.

COUNTY OF ORANGE, a Public
Entity of the State of California;
Orange County Deputy Sheriff P. MC
HUGH, individually and as an Orange
County Deputy Sheriff; TONY LA
RUFFA; DOES 1 through 10,

Defendants.

) Case No. SACV 06-545 AG (ANx)

) Assigned for All Purposes to the
) Honorable Andrew J. Guilford
) Courtroom 10D

) **[PROPOSED] JUDGMENT**

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1 This action came on regularly for trial on February 5, 2008 in Courtroom 10-
2 D of the United States District Court, Central District of California located at 411
3 4th Street, Santa Ana, California, the Honorable Andrew J. Guilford, presiding.
4 Plaintiff, Jay Edson Slade, Jr. ("Plaintiff") appeared by attorneys Emile Mullick
5 and Genaro Lara. Defendant Paul McHugh appeared by attorneys S. Frank Harrell
6 and Jason M. McEwen of Lynberg & Watkins. Defendant Anthony La Ruffa
7 appeared by his attorney, Edward Hess. A jury of eight persons was empaneled
8 and sworn. After hearing all of the evidence, the Court duly instructed the jury and
9 the cause was submitted to the jury. On February 8, 2008, the jury returned into
10 Court with a Special Verdict as follows:

11 **SPECIAL VERDICT FORM**

12 **QUESTION 1**

13 Did Defendant Deputy Paul McHugh, while effectuating the arrest of
14 plaintiff Jay Edson Slade, handcuff him, and then push him over a flower pot?
15

16 Yes _____ No X

17
18 If your answer to Questions 1 was "no" please proceed to Question 4. If
19 your answer was "yes" to question 1 please proceed to Question 2.

20 **QUESTION 2**

21 Did Defendant Deputy Paul McHugh cause plaintiff to suffer damages as a
22 result of Defendant McHugh's actions on August 11, 2005?
23

24 Yes _____ No _____

25 If your answer to Question No. 2 was "yes", proceed to Question No. 3. If
26 your answer was "no", please proceed to Question 4.
27
28

1 **QUESTION NO. 3**

2 Please indicate the amount of damages plaintiff was caused to suffer as a
3 result of the actions of defendant Paul McHugh on August 11, 2005.

4
5 Economic: \$_____

6 Non-Economic: \$_____

7 **QUESTION NO. 4**

8 Did Tony La Ruffa wrongfully cause a criminal proceeding to be brought
9 against Jay Edson Slade, Jr.?

10 Yes_____ No X

11 If your answer to Question No. 4 was “no”, please have your forepeson sign
12 and date this Special Verdict Form. If your answer to Question No. 4 was “yes”,
13 please proceed to Question No. 5.

14 **QUESTION NO. 5**

15 Was Plaintiff Jay Edson Slade, Jr. harmed by the acts of Defendant Tony La
16 Ruffa?

17 Yes_____ No_____

18 If your answer to Question No. 5 was “no”, please have your foreperson sign
19 and date this Special Verdict Form. If your answer to Question No. 5 was “yes”,
20 please proceed to Question No. 6.

21 **QUESTION NO. 6**

22 Was Defendant Tony La Ruffa’s conduct a substantial factor in causing
23 Plaintiff Jay Edson Slade’s harm?

24 Yes_____ No_____

25 If your answer to Question No. 6 was “no”, please have your foreperson sign
26 and date this Special Verdict Form. If your answer to Question No. 6 was “yes”,
27 please proceed to Question No. 7.

QUESTION NO. 7

What amount, if any, do you award Jay Edson Slade, Jr. as compensatory damages for harm caused by Defendant Tony La Ruffa?


Answer in dollars or NONE. \$_____

NOW, THEREFORE, IT IS ORDERED, ADJUDGED AND DECREED
as follows:

Defendants Paul McHugh and Anthony La Ruffa shall have Judgment in their favor and that Plaintiff, Jay Edson Slade, Jr. shall take nothing by way of his operative complaint against Defendants.

Defendants shall recover from Plaintiff, their costs of suit in accordance with applicable law; and that ~~this matter be, and hereby is, dismissed as to Defendants with prejudice~~ judgment be entered.

IT IS SO ORDERED.


HON. ANDREW J. GUILFORD
United States District Court Judge